

Category #13:

The Guidelines should not allow the use of cleaning products that contain heavy metals that are toxic to humans, animal life or the environment.

State Response:

OGS agrees that product ingredients, particularly those likely to have adverse effects on human health and the environment, should be avoided in cleaning and maintenance products used in schools. Due to their toxicological properties certain heavy metals, including arsenic, lead, cadmium, cobalt, chromium, mercury, nickel and selenium are listed in the guidelines as *Prohibited Ingredients* in general purpose cleaning products. Ingredients that are listed as known, probable, or possible human carcinogens by the International Agency for Research on Cancer (IARC), the National Toxicology Program (NTP), the U.S. Environmental Protection Agency (USEPA), or the Occupational Health and Safety Administration are also prohibited. Therefore, beryllium, which is classified by the USEPA as a probable human carcinogen, is also not permitted as an ingredient in general purpose cleaning products. OGS will support a review and revision of the Guidelines to see if additional heavy metals likely to adversely affect health and the environment should be considered for further restrictions while still allowing for reasonable variety and innovation in the market. (See also response to Category #50 – Recyclable Packing).

Frequently Asked Public Comment:**Must not Contain Heavy Metals**

--Must not contain heavy metals that are toxic to humans, animal life or the environment (Apply to Tier I Products).

(Deirdre Imus, Founder and President, The Deirdre Imus Environmental Center for Pediatric Oncology, Hackensack University Medical Center, The David Joseph Jurist Research Center For Tomorrows Children, Hackensack, NJ 07601)